



September 23, 2011

Via Electronic Filing

Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street SW Washington, DC 20554

Re: Connect America Fund, WC Docket No. 10-90; A National Broadband Plan for Our Future, GN Docket No. 09-51; Establishing Just and Reasonable Rates for Local Exchange Carriers, WC Docket No. 07-135; High-Cost Universal Service Support, WC Docket No. 05-337; Developing a Unified Intercarrier Compensation Regime, CC Docket No. 01-92; Federal-State Joint Board on Universal Service, CC Docket No. 96-45; Lifeline and Link-Up, WC Docket No.

03-109

Dear Ms. Dortch:

On September 21, 2011, Kyle McSlarrow, President, Comcast/NBCU, Washington D.C., and the undersigned ("Comcast") met with Commissioner Robert McDowell and Christine Kurth, Policy Director and Wireline Counsel, Office of Commissioner McDowell.

In the course of the discussion, Comcast emphasized the importance of ensuring that the Commission's plan for reforming intercarrier compensation eliminates on a going forward basis the disputes and controversies between voice service providers that have plagued the current regime. Comcast stated that the Commission can accomplish this principal objective by making clear that terminating exchange access and termination under section 251(b)(5) includes the termination of voice calls to an end user or to an affiliated or unaffiliated voice provider that in turn delivers the call to a retail end user and by adopting conforming changes to the Commission's rules.

Comcast also explained why its voice affiliates remain heavily dependent on tandem transit services offered by incumbent local exchange carriers to interconnect with wireless and wireline carriers throughout the country. Comcast urged the Commission to make clear that any measures it may adopt to reform the rules governing the transport and termination of voice traffic have no effect at all on the current arrangements that apply to tandem transit services, which will continue to be overseen by state regulatory commissions in interconnection proceedings. Finally, Comcast emphasized the company's continuing concern about the size of the high cost

universal service fund and its impact on consumers who contribute to it and expressed support for measures that would put downward pressure on the fund size.¹

Pursuant to section 1.206(b)(2) of the Commission's rules, 47 C.F.R. § 1.1206(b)(2), this *ex parte* notification is being filed for inclusion in the public record of the above referenced proceedings.

Respectfully submitted,

/s/ Mary McManus
Mary McManus

cc: Commissioner McDowell Christine Kurth

See, e.g., Comments of Comcast Corporation, WC Docket 10-90, at 21-24 (Aug. 24, 2011).